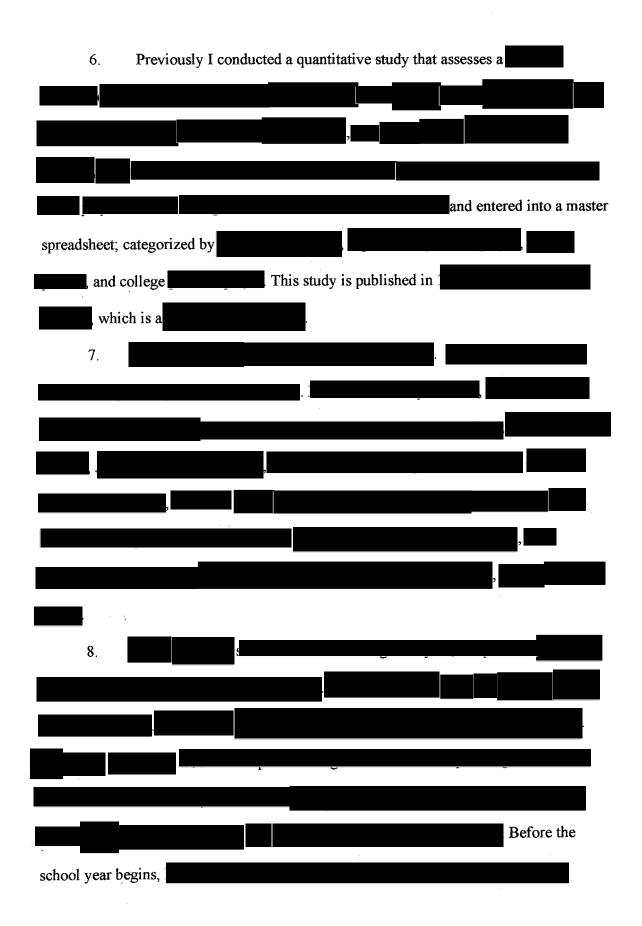
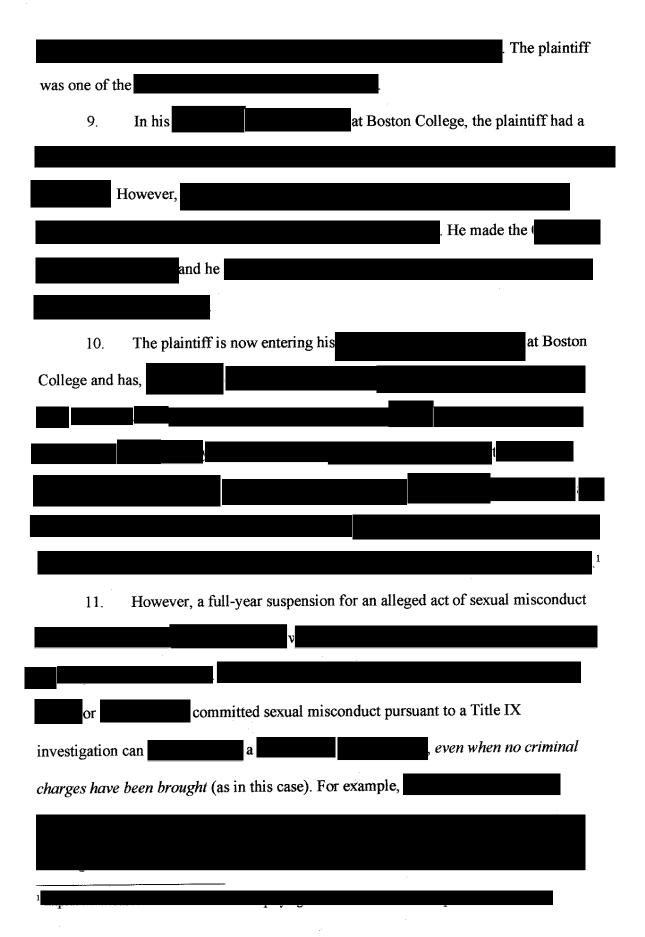
## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

JOHN DOE,			Civil Action No. 1:19-cv-11626 (DPW) *Sealed*
Plaintiff	.,		
v.			
TRUSTEES OF	F BOS	TON COLLEGE	
Defenda	ints.		
	1	AFFIDAVIT OF	
COUNTY OF		) ) ss	
STATE OF MI	CHIG	,	
		, being first duly sworn	on oath, deposes and says:
1.	In rend	lering this opinion, I have rev	iewed and obtained information from
the following s	ources	:	
	a.	The Complaint;	
	b.	Declaration of John Doe in S	Support of Plaintiff's Motion for a
Temporary Res	strainin	ng Order and a Preliminary In	junction Prohibiting Boston College
from Enforcing	g the Si	aspension of Plaintiff;	
	c.	Defendant's Opposition to P	laintiff's Motion for a Temporary
Restraining Or	der;		
	d.	, partner in	,
	e.	Plaintiff's at Boston Co	ollege and in the

	f. ;
	g. My
and	
	h. Supporting industry literature and media reports.
2.	I am a tenured professor in the
	, where I teach
	and Prior to joining the
faculty at	, I was a tenured professor at where I
taught	and torts and directed the law school's . I am
an attorney li	censed in
3.	I was an associate with the . from 2015 through 2018.
Before entering	ng academia, I advised and represented
From	, I was a first
lifetime mem	ber of the
4.	I am the author of a published article on the topic of lost earning capacity
damages in a	professional . I have published numerous additional articles on
legal and eco	nomic issues in the field of, including compensation issues. These
articles are lis	sted in my curriculum vitae attached to this affidavit. I also serve on the
editorial boar	d for the:
5.	I have been retained as an expert and have prepared reports in numerous
-related	matters, which includes deposition and trial testimony on lost earning
capacity of	all as listed and described in the curriculum vitae attached to this
affidavit.	





when he was enrolled there which stated that the vice president of l
Student Affairs and Services notified by email that (1) he violated the
university's policy on relationship violence and sexual misconduct, (2) he could no
longer re-enroll "in any capacity" and (3) he was banned from campus. <sup>2</sup> On the day of
that would not allow him to He
just two days later and
reported that the
Even reported that
<sup>4</sup> In a nutshell, the overall message from the media
in numerous reports was that an

If the plaintiff's motion is denied it would result in much greater harm to 12. the plaintiff than the potential harm, if any, that would result to the defendant if the plaintiff's suspension (which has not been, and would not be, made public) is stayed until the resolution of this case. Based upon my review of the Defendant's Opposition, it is evident to me that the defendant does not understand The nature of the 13.

